Brown v. Hamot Medical Center

Donald Inderlied

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Page 1
                   IN THE UNITED STATES DISTRICT COURT
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                FOR THE WESTERN DISTRICT OF PENNSYLVANIA
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      LISA BROWN, M.D.,
                Plaintiff
                v.
                                    Civil Action No. 05-32E
 5
     HAMOT MEDICAL CENTER,
 6
                Defendant
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                Deposition of DONALD INDERLIED, taken before
 9
           and by Carol A. Holdnack, RPR, Notary Public in and
10
           for the Commonwealth of Pennsylvania, on Thursday
17
           September 1, 2005, commencing at 9:49 a.m., at the
12
           offices of Scarpitti & Mead, Renaissance Center,
13
           1001 State Street, Suite 800, Erie, PA 16501.
14
15
16
     For the Plaintiff:
17
           Patrick Sorek, Esq.
           Leech Tishman Fuscaldo & Lampl, LLC
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           525 William Penn Place, 30th Floor
           Pittsburgh, PA 15219
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     For the Defendant:
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           Kerry M. Richard, Esq.
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          Washington, DC 20015
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24
                   Reported by Carol A. Holdnack, RPR
                                                              EXHIBIT
                  Ferguson & Holdnack Reporting, Inc.
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Case 1:05-cv-00032-MBC

Document 56-11

Filed 09/15/2006

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## Brown v. Hamot Medical Center

## Donald Inderlied

| Page 78 1 Q. Do you remember, can you explain what that note 2 means? 3 A. Dr. Cortina may have asked for specifics, specific facts when she was deficient in her responsibilities. 5 Q. Do you remember if he got a response? 6 A. I dorfnt, specifically. 7 Q. And if you look on the left margin of this page, 8 there's also what looks like a note. It says, "Lubahn" 9 something. 10 A. "Lubahn partner". 11 Q. Okay. And  |  |   | j  |  |
|--|--|---|--|--|
| 2 means? 3 A. Dr. Cortina may have asked for specifics, specifics 4 Facts when she was deficient in her responsibilities. 5 Q. Do you remember if he got a response? 6 A. I don't, specifically, 7 Q. And if you look on the left margin of this page, 8 there's sion what looks like a note. It says, "Lubahn" 9 something. 10 A. "Lubahn partner". 11 Q. Kay, And - 12 A. Reference to Dr. Carmak. 13 Q. Right. Was there a significance in your mind that she was a Lubahn partner? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the form Dr. Stefanovski. Do you see that? 17 note because she has an association with Dr. Lubahn, professional association; professional association; professional association; and like there's an arrow that says, "Up old Dr. Lubahn," and it's underlined. Do you see that? 18 Ric from Dr. Stefanovski. Do you see that? 20 Q. And kind of read the last clause. 21 MS. RICHARD: After the arrow, or before? 22 A. Um*hum. 23 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want residents important. To bou see that at the end of that? 26 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 27 A. Yes, sir. 28 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 29 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right. So Dr. Seeds also testified at this meeting; is that right. So Dr. Seeds also testified at this meeting; is that right. So Dr. Seeds also testified at this meeting; is that right. So Dr. Seeds also testified at this meeting; is that right. So Dr. Seeds also testified at this meeting; is that right. So Dr. Seeds also testified at this meeting; is that right. So Dr. Seeds also testified at this meeting; is that right. Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meetin |  |   | 1  | Page 80  |
| A. Dr. Cortina may have asked for specifics, specific facts when she was deficient in her responsibilities. Q. Do you remember if he got a response? A. I don't, specifically. Q. And if you look on the left margin of this page, 8 there's also what looks like a note. It says, "Lubahn" 9 something. Q. And if you look on the left margin of this page, 8 there's also what looks like a note. It says, "Lubahn" 9 something. Q. And "Lubahn parther". 11 Q. Okay, And - 12 A. Reference to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that the was a Lubahn parther? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the note because she has an association with Dr. Lubahn, portessional association? 19 A. Very well could be. Q. Go to Page 964. And there is a passage that looks like from Dr. Stefanovski. Do you see that? 22 A. Um-hum. 23 Q. And kind of read the last clause. 24 MS. RICHARD: Alter the arrow, or before? 25 Q. This is what I want to ask you about. If you want 1 to read that area. It's in that area (indicating). 2 A. (Witness compiles.) Okay. 3 Q. You wrote down — it looks like, "Input from residents important." Do you see that at the end of that? 4 A. Thelieve that was a statement, if you see that? 26 Q. This is what I want to ask you about. If you want 27 A. I believe so. 3 Q. Do you believe that was reflected in the committee's discussions? That they were, in fact, valuing the input from the residents? 11 A. Yes, sir. 12 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 13 A. Yes, sir. 14 Q. And then kind of a third of the way down the page — 25 MS. RICHARD: Which page are we on? 26 MS. RICHARD: Which page are we on? 27 MS. RICHARD: Which page are we on? 28 MS. RICHARD: Which page are we on? 29 MS. RICHARD: Which page are we on? 20 MS. RICHARD: Which page are we on? 21 MS. RICHARD: Which page are we on? 22 MS. RICHARD: Which page are we on? 23 MS. RICHARD: Which page are we on? 24 MS. ROMES Soft. 25 MS. RICHARD: Whic | 1  | <ul> <li>Q. Do you remember, can you explain what that note</li> </ul>  | ι  |  |
| 4 facts when she was deficient in her responsibilities. 5 Q. Do you remember if he got a response? 6 A. I don't, specifically. 7 Q. And if you look on the left margin of this page, there's ask ow hat looks like a note. It says, "Lubahn" something. 10 A. "Lubahn partner". 11 Q. Okay. And "- 12 A. Reference to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that the she was a Lubahn partner? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, professional association? 19 A. Very well could be. 20 Q. Go to Page 964. And there is a passage that looks 21 like from Dr. Stefanovski. Do you see that? 22 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want 19 to read that area. It's in that area (indicating). 2 A. (Witness complies.) Okay. 3 Q. You wrote down — it looks like, "Input from residents important." Do you see that at the end of that? 4 A. Yes, sir. 4 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 5 A. Yes, sir. 10 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 17 A. Yes, sir. 18 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 19 A. Yes, sir. 10 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 19 A. Yes, sir. 10 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 10 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 19 A. Yes, sir. 20 Q. And there's a page missing after this one, All right. So Dr. Seeds also testified at this meeting; is that right? 21 A. Yes, sir. 22 Q. And there's a page missing after this one, All right. So Dr. Seeds als | 2  | means?  | 2  | A. Yes, sir.   |
| 4 facts when she was deficient in her responsibilities. 5 Q. Do you remember if he got a response? 6 A. I don't, specifically. 7 Q. And if you look on the left margin of this page, there's asio what looks like a note. It says, "Lubshn" something. 10 A. "Lubahn partner". 11 Q. Okay. And 12 A. Reference to Dr. Cermak. 12 Q. Right. Was there a significance in your mind that the was a Lubahn partner? 13 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, protected as a subshall partner? 14 she was a Lubahn partner? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, 18 professional associations? 19 A. Very well could be. 20 Q. Go to Page 964. And there is a passage that looks 12 like from Dr. Stefanovski. Do you see that? 21 Q. And kind of read the last clause. 22 Q. And kind of read the last clause. 23 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want 19 to read that area. It's in that area (indicating). 2 Q. You wrote down — it looks like, "Input from residents important." Do you see that at the end of that? 3 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 11 A. Yes, sir. 12 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 13 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 14 A. Yes, sir. 15 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 16 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 17 A. Yes, sir. 18 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 19 Q. And there's a page missing afte    | 3  |   | 3  | Q. It looks like it is. Is this the point when   |
| 5 Q. Do you remember if he got a response? 6 A. I don't, specifically. 7 Q. And if you look on the left margin of this page, 8 there's also what looks like a note. It says, "Lubahn" 10 A. "Lubahn partner". 11 Q. Okay. And  | 1 -  | facts when she was deficient in her responsibilities.   | 4  | somebody said we should take a vote to keep her or not,  |
| 6 A. I believe that was a stail ament, if you see the senters glust above by Dr. Corlina. 8 Cy. I see. 9 Something. 10 A. "Lubahn partner". 11 Q. Okay: And 12 A. Reference to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that 14 she was a Lubahn partner? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, 18 portessional association? 19 A. Very well could be. 20 Q. Go to Page 564. And there is a passage that looks Ilike from Dr. Stefanovski. Do you see that? 22 A. Um-hum. 23 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want  Page 79 1 to read that area. It's in that area (indicating). 2 A. (Witness complies.) Okay. 3 Q. You wrote down it looks like, "Input from residents important." Do you see that at the end of that? 5 A. Yes, sir. 6 Q. That's something that Dr. Stefanovski said? 7 A. I believe that was a resident at the time as well, right? 11 A. Yes, sir. 12 Q. And there's a page missing after this one. All right. A Yes, sir. 13 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 11 A. Yes, sir. 12 Q. And there's a page missing after this one. All right? 13 Q. And then kind of a third of the way down the page 20 MS. RICHARD: Which page are we on? 21 MR. SOREK: 966. 22 MS. RICHARD: Which page are we on? 23 MS. RICHARD: Which page are we on? 24 MS. RICHARD: Which page are we on? 25 MS. RICHARD: Which page are we on? 26 MS. RICHARD: Which page are we on? 27 MS. RICHARD: Which page are we on? 28 MS. RICHARD: Which page are we on? 29 MS. RICHARD: Which page are we on? 20 MS. RICHARD: Which page are we on? 21 MR. SOREK: 966. 22 MS. RICHARD: Okay. 23 Q. You've got an asterisk circled. You have No. 1 temperature of the           | 1  | Q. Do you remember if he got a response?  | 5  | something to that effect?  |
| 7 generace just above by Dr. Corlina. 8 there's also what looks like a note. It says, "Lubahn" of something. 10 A. "Lubahn parther". 11 Q. Koay. And — 12 A. Reference to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that she was a bubahn parther? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, 18 professional association with Dr. Lubahn, 19 professional association with Dr. | l l  |   | 6  | <ol> <li>I believe that was a statement, if you see the</li> </ol>   |
| there's also what looks like a note. It says, "Lubahn" 9 something.  A. **Lubahn partner".  Q. Okay. And   | 1  | O. And if you look on the left margin of this page,   | 7  | sentence just above by Dr. Corlina.  |
| 9 A. And what option would you follow. And there were two options; termination or pro action. 10 Q. Okay. And 11 Q. Okay. And 12 A. Reference to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that 14 she was a Lubahn partner? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, 18 professional association? 19 A. Very well could be. 20 Q. Go to Page 964. And there is a passage that looks 21 like from Dr. Stefanovski. Do you see that? 21 A. Um-hum. 22 A. Um-hum. 23 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want 1 to read that area. It's in that area (indicating). 2 A. (Witness complies.) Okay. 3 Q. You wrote down — it looks like, "Input from residents important." Do you see that at the end of that? 5 A. Yes, sir. 6 Q. That's something that Dr. Stefanovski said? 7 A. I believe so. 8 Q. Do you believe that was reflected in the committee's discussions? That they were, in fact, valuing the input from the residents? 11 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that fright? 17 A. Yes, sir. 18 Q. And then was a resident at the time as well, right? 19 Q. And he was a resident at the time as well, right? 10 Q. And there's a page missing after this one. All right. 11 Q. And there were two options; termination or pro zation. 12 Q. All right. 13 A. And he said termination 14 A. And he said termination 15 A. Yes, sir. 16 Q. And kind the last nate you have, looks like the said that. 17 In think, one of the said that. 18 A. Um-hum. 19 C. Do you know how the vite was taken? I mean, physically there: So I do not believe it was on :heets of paper. Dr. It was not physically there. So I don't believe it was on :heets of paper and how they vite was a large flat on the end of that? 18 A. To be over the was on :heets of paper and how they vite was a large flat on the end of that? 19 A. Yes, s       | 1  |   | 8  | •  |
| 10 A. "Lubahn partner". 11 Q. Okay. And 12 A. Refreence to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that 14 she was a Lubahn partner? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, 18 professional association? 19 A. Very well could be. 20 Q. Go to Page 964. And there is a passage that looks 21 like from Dr. Stefanovski. Do you see that? 22 A. Um-hum. 23 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want 26 You wrote down – it looks like, "Input from 27 residents important." Do you see that at the end of that? 28 A. Yes, sir. 29 Q. And there's a page missing after this one. All 29 right. So Dr. Seeds also testified at this meeting; is that 19 right. So Dr. Seeds also testified at this meeting; is that 19 page – 20 MS. RICHARD: Which page are we on? 21 MR. SOREK: 966. 22 MS. RICHARD: Which page are we on? 23 Q. You've got an asterisk circled. You have No. 1 24 terminated, No. 2, probation. Do you see that? 25 A. Yes, sir. 26 Q. And there kas a seguit file the put from the residents? 27 A. Yes, sir. 28 Q. And there's a page missing after this one. All 29 professional association with Dr. Lubahn, 20 professional association with Dr. Lubahn, 21 indentified. Do you see that? 22 A. Um-hum. 23 Q. Not kind this meeting is uphold 24 Dr. Lubahn's decision. 25 Q. Do you know how the v: the was taken? I mean, 26 physically. Sheets of paper? Dik Ither puts the that of the arial was the end of that? 27 A. I don't believe it was on sheets of paper. Again, 28 there of paper. It was discussion of the group and how 29 they voted. 30 Q. Do you know whether at any time — do you know 31 they voted. 32 Q. And there's a page missing after this one. All 33 A. Yes, sir. 44 Yes, sir. 55 Q. And there's a page missing after this one. 56 Q. On you believe that was reflected in the 57 Q. And there's a page missing after this one. 58 Q. Do you know whether    | ł  |   | 1  | <del>"</del>   |
| 11 Q. Okay. And 12 A. Reference to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that 14 she was a Lubahn parther? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, 18 professional association? 19 A. Very well could be. 20 Q. Go to Page 964. And there is a passage that looks 21 like from Dr. Stefanovski. Do you see that? 22 A. Um-hum. 23 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want 26 Vou wrote down it looks like, 'Input from 27 residents important." Do you see that at the end of that? 28 A. Ves, sir. 29 Q. Do you believe that was reflected in the 29 committee's discussions? That they were, in fact, valuing 10 the input from the residents? 11 A. Yes, sir. 12 Q. And there's a page missing after this one. All 13 right. So Dr. Seeds also testified at this meeting; is that 14 right? 19 A. Yes, sir. 10 Q. And there's a page missing after this one. All 13 right. So Dr. Seeds also testified at this meeting; is that 14 right? 19 A. Yes, sir. 20 MS. RICHARD: Which page are we on? 21 MR. SOREK: 966. 22 MS. RICHARD: Which page are we on? 23 Q. You've got an asterisk circled. You have No. 1 24 terminated; No. 2, probation. Do you see that? 24 terminated; No. 2, probation. Do you see that? 25 Like from Dr. Stefanovski and? 26 A. Um-hum. 27 Q. How did this meeting cn tclude? 28 A. Um-hum. 29 D. How did this meeting cn tclude? 29 A. It concluded with the cummittee voting to uphold Dr. Lubahn's decision. 29 Do you know how the vote was taken? I mean, 29 physically. Sheets of paper? Did the cummittee voting to uphold Dr. Lubahn's decision. 29 Do you know how the vote was taken? I mean, 29 physically. Sheets of paper is the cummittee voting to uphold Dr. Lubahn's decision. 29 Do you know how the vote was taken? I mean, 29 physically. Sheets of paper is the cummittee voting to uphold Dr. Lubahn's decision. 29 Do you know how the vote was take       | 1 -  |   | 1  | •  |
| 12 A. Reference to Dr. Cermak. 13 Q. Right. Was there a significance in your mind that 1 she was a Lubahn partner? 15 A. No, sir. 16 Q. You don't think maybe that you may have made the 1 note because she has an association? 18 professional association? 19 A. Very well could be. 20 Q. Go to Page 964. And there is a passage that looks 21 like from Dr. Stefanovski. Do you see that? 21 Q. And kind of read the last clause. 22 Q. And kind of read the last clause. 23 Q. And kind of read the last clause. 24 MS. RICHARD: After the arrow, or before? 25 Q. This is what I want to ask you about. If you want  Page 79 1 to read that area. It's in that area (indicating). 2 A. (Witness complies.) Okay. 3 Q. You wrote down — it looks like, "Input from 4 residents important." Do you see that at the end of that? 5 A. Yes, sir. 6 Q. That's something that Dr. Stefanovski said? 7 A. I believe so. 8 Q. Do you know whether at any time — do you know whether the committee was looking at any documents during the input from the residents? 11 A. Yes, sir. 12 Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? 13 A. Yes, sir. 14 Q. And then kind of a third of the way down the 19 page — MS. RICHARD: Which page are we on? 15 MS. RICHARD: Which page are we on? 16 MS. RICHARD: Which page are we on? 17 MR. SOREK: 966. 28 MS. RICHARD: Okay. 29 Q. Vou've got an asterisk circled. You have No. 1 this in the time as sell, if plit? the printing that the end of the way down the 1 page — 20 MS. RICHARD: Which page are we on? 29 MS. RICHARD: Which page are we on? 20 MS. RICHARD: Which page are we on? 21 MR. SOREK: 966. 22 MS. RICHARD: Okay. 23 Q. You've got an asterisk circled. You have No. 1 the profession and the time as well, it is not provided to the cummittee or mittee looked at the page evaluations of Dr. Brown: 29 O. You've got an asterisk circled. You have No. 1 the profession and the time as well, it is need that the crimmittee of the earth means the time that the time as well, it i | 1 -  | •   | i .  |  |
| Q. Right. Was there a significance in your mind that she was a Lubahn partner?  A. No, sir.  Q. You don't think maybe that you may have made the 17 note because she has an association with Dr. Lubahn, 18 professional association?  P. A. Very well could be.  Q. Go to Page 964. And there is a passage that looks 21 like from Dr. Stefanovski. Do you see that?  A. Um-hum.  Q. And kind of read the last clause.  MS. RICHARD: After the arrow, or before?  Q. This is what I want to ask you about. If you want  Page 79  1 to read that area. It's in that area (indicating).  A. (Witness complies.) Okay.  Q. You wrote down — It looks like, "Input from 4 residents important." Do you see that at the end of that?  A. Yes, sir.  Q. Do you believe that was reflected in the 9 committee's discussions? That they were, in fact, valuing 10 the input from the residents?  A. Yes, sir.  Q. And there's a page missing after this one. All 13 right. So Dr. Seeds also testified at this meeting; is that 14 right?  A. Yes, sir.  Q. And the was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And the was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. Yes, sir.  Q. And then was a resident at the time as well, right?  A. | 1 -  |   | }  |  |
| she was a Lubahn partner?  A. No, sir.  Q. All right. And the last nite you have, looks like there's an arrow that says, "Uproid Dr. Lubahn," and it's underlined. Do you see that?  A. Very well could be.  Q. Go to Page 964. And there is a passage that looks like from Dr. Stefanovski. Do you see that?  A. Um-hum.  Like from Dr. Stefanovski. Do you see that?  A. Um-hum.  Q. And kind of read the last clause.  Q. And kind of read the last clause.  Q. This is what I want to ask you about. If you want  Page 79  1 to read that area. It's in that area (indicating).  A. (Witness complies.) Okay.  Q. That's something that Dr. Stefanovski said?  A. Yes, sir.  Q. And there's a marow that says, "Uproid Dr. Lubahn," and it's underlined. Do you see that?  A. Um-hum.  220  Q. How did this meeting conclude?  A. It concluded with the committee voting to uphold Dr. Lubahn's decision.  231  Dr. Lubahn's decision.  242  A. Um-hum.  253  Q. And kind of read the last clause.  Page 79  1 to read that area. It's in that area (indicating).  A. (Witness complies.) Okay.  G. Q. Toy wrote down — it looks like, "Input from the residents important." Do you see that at the end of that?  A. Yes, sir.  G. Q. That's something that Dr. Stefanovski said?  A. It was discussion of the group and how they voted.  G. Do you know whether at any time — do you know whether at any documents during its meetings?  A. To the best of my knowledge, they were not in the first meeting. And I was not present in the other two, so I don't know.  C. Poy ou know whether the committee generated any documents, such as —  A. No, sir.  G. And then was a resident at the time as well, right?  A. Yes, sir.  G. And then was a resident at the time as well, right?  A. Yes, sir.  G. And then was a resident at the time as well, right?  A. Yes, sir.  G. And then was a resident at the time as well, right?  A. Yes, sir.  G. And then was a resident at the time as well, right?  A. Yes, sir.  G. And then was a resident at the time as well, right?  A. Yes, sir.  G. Do you be fore the ca | 1  |   |  |  |
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| 25 A. Yes. 25 them indicated that they had done so.  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. (Witness complies.) Okay. Q. You wrote down it looks like, "Input from residents important." Do you see that at the end of that? A. Yes, sir. Q. That's something that Dr. Stefanovski said? A. I believe so. Q. Do you believe that was reflected in the committee's discussions? That they were, in fact, valuing the input from the residents? A. Yes, sir. Q. And there's a page missing after this one. All right. So Dr. Seeds also testified at this meeting; is that right? A. Yes, sir. Q. And he was a resident at the time as well, right? A. Yes, sir. Q. And then kind of a third of the way down the page MS. RICHARD: Which page are we on? MR. SOREK: 966. MS. RICHARD: Okay. Q. You've got an asterisk circled. You have No. 1  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | sheets of paper. It was discussion of the group and how they voted.  Q. Do you know whether at any time do you know whether the committee was looking at any documents during its meetings?  A. Which meeting are we talking about now?  Q. Any of the three meetings.  A. To the best of my knowledge, they were not in the first meeting. And I was not present in the other two, so I don't know.  Q. Fair enough. You don't remember them talking about documents, such as  A. No, sir.  Q. All right.  A. No, sir.  Q. Do you know whether the committee generated any documents as a result of its meetings?  A. To the best of my knowledge, only the letters that I've seen that went to Dr. Brown.  Q. Okay. Do you know whether the committee looked at the paper evaluations of Dr. Brown.  A. I do not specifically know that they did that.  In, I think, one of the earlier memos; that we looked at, it   |
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21 (Pages 78 to 81)

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## Brown v. Hamot Medical Center

Donald Inderlied

| Page   |   |
|--|---|
| Q. So this letter, the date on this letter can't be  | 1 to uphold the decision, correct?  |
| 2 correct.   | 2 A. Yes, sir.  |
| 3 A. No, sir. It's my understanding that that is   | Q. Did you have any any role in producing this  |
| 4 incorrect. It was done on the 8th. It's a typographical  | 4 letter for  |
| 5 error.   | 5 A. No, sir.   |
| 6 Q. So this letter was sent out the same day the  | 6 MS. RICHARD: Wait for him to finish the question.   |
| 7 committee took the vote, as far as you know.   | 7 A. I'm sorry.   |
| 8 A. As far as I know, yes, sir.   | 8 Q. All right. I'm going to ask you to take a look at  |
| 9 Q. All right. So there wasn't you had no   | 9 Bates No. 1064.   |
| 10 Involvement in the grievance process between the committee  |   |
| 11 vote and the issuance of this letter?   | 11 Q. What is this document?  |
| 12 A. No, sir, I did not.  | 12 A. (No response.)  |
| 13 Q. Did you have any involvement in the review of  | 13 Q. It's notes, right?  |
| 14 Dr. Brown's termination after that?   | 14 A. Yes.  |
| 15 A. After that letter?   | 1   |
| 16 Q. Yes.   | 1 110 110, 750, 110,000,  |
| 17 A. No, sir.   | i a sa s   |
| 18 Q. I'm going to ask you to take a look at Bates   | 17 Q. All right. And it's just a couple entries. There  |
| 19 No. 233 and 234. And that's the first document after your   | 18 is a date, May 17th, '04, Medical Education Committee.   |
| 20 notes.  | 19 Review of Dr. Brown's situation. Dr. Albert presented the  |
| 21 (Interruption in the proceedings.)  | 20 case, and Grievance Committee unanimous approval. That's   |
| ( and for any processings)   | 21 basically what it contains, right?   |
| the state of the s | 22 A. Yes, sir.   |
| 23 letter from Or. Pepicello to me, so I'm going to assume you   | 23 Q. Were you present at that meeting?   |
| 24 haven't seen it before. Is that fair? 25 A. Yes. sir.   | 24 A. I made those notes, so I - but I honestly don't   |
| 25 A. Yes, sir.  | 25 remember being present, unless the Medical Education   |
| Page 87  |   |
| 1 Q. You have not seen this document before, correct?  | 1 Committee met before another corranittee.   |
| 2 A. No, sir.  | 2 Q. Can you Illuminate - let's see. What's the   |
| Q. One thing I want to ask you about is the second   | 3 relationship between the Medical Education Committee and the  |
| 4 sentence of the second paragraph. It says, "The committee  | 4 Medical Staff Executive Committee?  |
| 5 considered the recommendations of Dr. Lubahn, the fact that  | 5 A. I don't know.  |
| 6 Dr. Brown had been on probation at least twice during her  | 6 Q. What is the medical what (loes the Medical   |
| 7 residency program, and that she was not performing at the  | 7 Education Committee do?   |
| 8 level of the third year resident." Do you see that?  | 8 A. I don't know specifically.   |
| 9 A. Yes, sir.   |   |
| 10 Q. Do you know anything about Dr. Brown's   | 9 Q. What does the Medical Staff Executive Committee  10 do?  |
| 11 probationary status?  | ) R   |
| 12 A. No, sir.   | g and the state of the state of the state of the  |
| 13 MR. SOREK: That's it, then, for that.   | 12 medical staff. And they are the – they are – the Medical   |
| 14 (Recess held from 12:30 p.m. to 1:54 p.m.)  | 13 Staff Executive Committee is the officers - I'm not sure   |
| Q. Mr. Inderlied, we've had a lunch break, and we're   | 14 who all is on that committee that are representatives of   |
| 16 back. And I want to ask you some more questions about some  | 15 the medical staff.   |
| documents that we've received from the hospital.   | 16 Q. And I take it they would have a role in hiring,   |
| 18 A. All right.   | 17 firing, promotion. Do they?  |
|  | 18 A. No, sir.  |
| C. Take a look at baces No. 239,   | 19 Q. They don't. They did have a review function in  |
| (Waless complies.) Okay.   | 20 Dr. Brown's case, though.  |
| 27 That's a may 27 of fetter from Dr. Pepicello to   | 21 A. I believe they have a review function, yes.   |
| - Contract   | 22 Q. And do you know where that function comes from?   |
| 1.50, 311.   | 23 That is, where do they get the authority to say, well, we're   |
| e. And it advises her about the decisions of the   | Q. And I take it they would have a role in hiring, firing, promotion. Do they?  A. No, sir.  Q. They don't. They did have a review function in Dr. Brown's case, though.  A. I believe they have a review function, yes.  Q. And do you know where that function comes from?  That is, where do they get the authority to say, well, we're not involved in the firing decision, but we'll review the firing decision. |
| 25 hospital committees that reviewed her termination decision  | 25 firing decision.   |
| d) with the state of the state  | <u>E</u>  |

23 (Pages 86 to 89)